

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

HUEYLI LI	:	
3841 Silverwood Drive	:	
Stow, Ohio 44224	:	
 Plaintiff	:	CASE NO. 5:21-cv-2277
 v.	:	JUDGE
 UNIVERSITY OF AKRON	:	
302 Buchtel Common	:	
Akron, Ohio 44325	:	
 Defendant	:	

**PLAINTIFF HUEYLI LI'S COMPLAINT**  
**(w/ Jury Demand)**

NOW COMES Plaintiff Hueyli Li and hereby proffers this Complaint for damages against Defendant University of Akron.

1. Plaintiff is a natural person of Asian descent residing in the State of Ohio.
2. Defendant is a state university of the State of Ohio with facilities in Summit County, Ohio.
3. Plaintiff served as a tenured faculty member in Defendant's Department of Educational Foundations and Leadership from the Fall of 1995 until she was the subject of a reduction in force ("RIF") on or about August 21, 2020.
4. Defendant released 24% of the faculty of Asian descent in the RIF, which was significantly a larger proportion than faculty of American descent.
5. Defendant's release of 24% of those with Asian color and features was also a significantly larger proportion than those of Caucasian skin color and features.

6. Plaintiff filed a Charge of Discrimination with the Ohio Civil Rights Commission (“OCRC”) and Equal Employment Opportunity Commission (“EEOC”) on or about October 23, 2020 that included claims of discrimination based on race and/or national origin.
7. Plaintiff was issued a Notice of Suit Rights by the EEOC on September 16, 2021.
8. Prior to the RIF, Plaintiff taught foundational courses in Education and a wide variety of teaching courses that all continued to be taught at Defendant’s institution after the RIF and are still being taught today.
9. After the RIF, Plaintiff was asked to teach two of the same courses for Defendant on a part-time basis, but without a regular faculty position, and at a significantly lower level of pay and benefits.

**COUNT I**  
**NATIONAL ORIGIN AND/OR RACE DISCRIMINATION**  
**42 U.S.C. § 2000e, et seq.**

10. Plaintiff reasserts and reincorporates each and every allegation contained in ¶¶1-9 above as if fully rewritten here.
11. Plaintiff is an “employee” as defined by 42 U.S.C. § 2000e, et seq.
12. Defendant is an “employer” as defined by 42 U.S.C. § 2000e, et seq.
13. In its actions described above, Defendant discriminated against Plaintiff on the basis of her national origin and/or her race in violation of Title VII law by choosing her to be part of the reduction in force and retaining those not in the protected classes set forth in this Complaint because of the differences in national origin and/or race.
14. Defendant’s violations of federal law entitle Plaintiff, pursuant to 42 U.S.C. § 2000e-5, to monetary damages which include lost pay and benefits, compensatory damages, and attorneys fees and costs of bringing this litigation, in an amount to be determined at trial, but

in any event at least \$450,000.00, as well as such equitable remedies as shall be deemed proper by the Court.

**WHEREFORE**, Plaintiff demands,

for Count I, monetary damages including back pay and benefits, compensatory damages, and attorneys' fees and costs, in an amount to be determined at trial, but in any event at least \$450,000.00, as well as such equitable remedies as shall be deemed proper by the Court.

**JURY DEMAND**

Plaintiff demands that a jury decide all claims in this Complaint.

Respectfully Submitted,

s/ Gary A. Reeve  
Gary A. Reeve (0064872)  
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